



SUSMAN GODFREY

August 4, 2025

VIA ECF

Hon. Ona T. Wang
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

Re: *In Re: OpenAI, Inc., Copyright Infringement Litigation*, No. 1:25-md-3143-SHS-OTW.

Dear Judge Wang:

We write on behalf of OpenAI and the Class Plaintiffs in *Bartz v. Anthropic*, 24-cv-5417-WHA (N.D. Cal.) to update the Court regarding the parties' efforts to moot their dispute regarding production of certain transcripts and exhibits of depositions taken in this action of former OpenAI employees who presently work at Anthropic. *See* Dkt. 379.

The parties have reached agreement as to the scope of the currently in-dispute transcript and exhibits, and the materials will be produced in the *Bartz* action (and designated under the protective order in that matter) by the end of this week.

The parties thus anticipate that there will be no issue to address at the Court's August 12th conference.

Respectfully Submitted,

KWUN BHANSALI LAZARUS LLP

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/s/ Michael Kwun
Michael Kwun
Counsel for OpenAI

/s/ J. Craig Smyser
J. Craig Smyser
Counsel for Class Plaintiffs in *Bartz v. Anthropic*, 24-cv-5417 (N.D. Cal.)